EXHIBIT A

Jennifer Ford vs Veterans Guardian VA Claim Consulting Kehoe, Samantha on 11/07/2024

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
GREENSBORO DIVISION

CASE NO. 1:23-cv-756-CCE-LPA

JENNIFER FORD, individually and on behalf of all others similarly situated,

Plaintiff,

vs.

VETERANS GUARDIAN VA CLAIM CONSULTING, LLC,

Defendant.

DEPOSITION OF SAMANTHA KEHOE

TAKEN ON BEHALF OF THE PLAINTIFF

NOVEMBER 7TH, 2024 10:03 A.M. TO 4:26 P.M.

ALL PARTIES APPEARED REMOTELY
PURSUANT TO
FLORIDA SUPREME COURT ORDER AOSC20-23

REPORTED BY:
ABIGAIL HOGARTH, CER, COURT REPORTER
NOTARY PUBLIC, STATE OF FLORIDA



Office Phone: 954-712-2600 Email: info@ucrinc.com Website: ucrinc.com

Jennifer Ford vs Veterans Guardian VA Claim Consulting Kehoe, Samantha on 11/07/2024 Pages 146..149

				on 11/07/2024 Pages 146149
1	A	Page 146 I can't imagine that section right now.	1	Page 148 Q Oh, Jason, I'm sorry. Jason Thomas. What's
2	0	Okay. Give me one second. I'm going to get	2	•
3	_	it pulled up. Okay. And I think I know how to	3	
4		so that it shows up on your end. Let me see	4	•
5	here.	so that it shows up on your end. Het me see	5	
6	Here.	Olean Ma Walan and the dearmant	6	
	that Th	Okay. Ms. Kehoe, can you see the document		you get locked out of Salesforce or who's he? A I'm not sure what his role is with the IT
7		ave pulled up here?	7	
8	A	Yes.	8	department. He's the only member of the IT department
9	,	MR. BROCHU: And Madam Court Reporter, please	9	whose name I can remember at this time.
10	mar	this as Exhibit 1, Bates Number VG0005830.	10	Q Okay. Now, is he part of IT development or IT
11		(Thereupon, Plaintiff's Exhibit 1 was entered	11	
12		into the record.)	12	
13		THE COURT REPORTER: Okay.	13	
14	BY MR. B		14	
15	Q	Ms. Kehoe, have you ever seen this document	15	Q Marketing and social media, who runs those
16	before?		16	departments?
17	A	Yes.	17	A Joanna Murphy.
18	Q	When's the first time you saw this document?	18	Q Joanna Murphy?
19	A	I am not sure.	19	A Yes.
20	Q	Do you know who prepared this document?	20	Q Would it surprise you that Veterans Guardian
21	A	I do not.	21	is advertising using the word VSO near me?
22	Q	Did you see this for the first time in the	22	A Yes.
23	last weel	ς?	23	Q Is Veterans Guardian directly competing with
24	A	I don't believe so.	24	Veterans Service Organizations?
25	Q	Was it during the first month of your	25	A I'm not sure.
		Page 147		Page 149
1	employmen	nt?	1	Q Do you think that Veterans Guardian is a
2	A	No.	2	direct competitor to a Veterans Service Organization?
3	Q	Okay. And who is the Chief Executive Officer	3	A I do not know.
4	of Vetera	ans Guardian?	4	Q Do you think in your own understanding of
5				Q Do you think in your own understanding of
5	A	Scott Greenblatt.	5	public policy, based on your background, that Veterans
6	A Q	Scott Greenblatt. Who's the Chief Operating Officer?	5 6	
				public policy, based on your background, that Veterans Guardian is competing with VA accredited
6	Q	Who's the Chief Operating Officer?	6	public policy, based on your background, that Veterans Guardian is competing with VA accredited
6 7	Q A	Who's the Chief Operating Officer? Bill Taylor.	6 7	public policy, based on your background, that Veterans Guardian is competing with VA accredited representatives?
6 7 8	Q A Q	Who's the Chief Operating Officer? Bill Taylor. Human Resources?	6 7 8	public policy, based on your background, that Veterans Guardian is competing with VA accredited representatives? A No.
6 7 8 9	Q A Q A	Who's the Chief Operating Officer? Bill Taylor. Human Resources? I'm sorry, do you want the name of	6 7 8 9	<pre>public policy, based on your background, that Veterans Guardian is competing with VA accredited representatives? A No. Q Why not? A I just do not believe that Veterans Guardian</pre>
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I don't know if your Counsel has any other questions for you at this time, but as of right now, I do not have any other questions for you. But I do want to thank you and your husband for your service to our country and for your time today. MS. WOLVERTON: Thanks so much. Well, we'll just ask to take a two-minute break and we'll be right back. So, can we go off the record for two minutes? (Thereupon, a short discussion was held off record.) MS. WOLVERTON: No questions. THE COURT REPORTER: Okay. We're back on the seither, Ms. Kehoe greatly appreciate your time. Safe travels home. Thank you. MS. WOLVERTON: Thank you so much. And we do reserve the right to read and sign the transcript, please. THE COURT REPORTER: Okay. Thank you. And Counsel, would you like to order the transcript today? Page 255 MS. WOLVERTON: Yes, please. THE COURT REPORTER: All right. Standard delivery, 1D business days is, okay? MS. WOLVERTON: Yes. EATHE COURT REPORTER: All right. Standard delivery, 1D business days is, okay? MS. WOLVERTON: Yes.		Kenoe, Samantha on 11/07/2024 Pages 25425				
2 questions for you at this time, but as of right 3 now, I do not have any other questions for you. 4 But I do want to think you and your bashand 5 for your service to our country and for your time 6 today. No. NOLMERTON: Thanks so much. Well, we'll 8 right back. So, can we go off the record for two minutes? 11 (Opposition resumed.) 12 record.) 13 (Opposition resumed.) 14 THE COURT RESECTERS: Okay. We're back on the 16 record. 16 NS. NOLMERTON: No questions. 17 NS. NOLMERTON: No questions. 18 either, No. Nohoe greatly appreciates your time. 19 Safe travels home. Thanky you, so much. And we do 10 reserve the right to read and sign the transcript. 10 PLANE COURT RESECTERS: Okay. Thank you. Sand 11 NS. NOLMERTON: Yea, please. 11 NS. NOLMERTON: Yea, please. 12 THE COURT RESECTERS: Okay. Thank you. Sand 13 You like to order the transcript as well? 14 NS. NOLMERTON: Yea, please. 15 THE COURT RESECTERS: Okay. Mr. Brodhu, would 16 you like to order the transcript as well? 17 NS. NOLMERTON: Yea, please. 18 NS. NOLMERTON: Yea, please. 19 NS. NOLMERTON: Yea, please. 2 THE COURT RESECTERS: Okay. Mr. Brodhu, would 3 you like to order the transcript as well? 2 THE COURT RESECTERS: Okay. Mr. Brodhu, would 3 you like to order the transcript as well? 3 NS. NOLMERTON: Yea, please. 4 NS. NOLMERTON: Yea, please. 5 THE COURT RESECTERS: Okay. Mr. Brodhu, would 19 DE COURT RESECTERS: Okay. Mr. Brodhu, would 20 NS. NOLMERTON: Yea, please. 2 THE COURT RESECTERS: Okay. Mr. Brodhu, would 3 You like to order the transcript as well? 4 NS. NOLMERTON: Yea, please. 5 THE COURT RESECTERS: Okay. Mr. Brodhu, would 6 delivery, 10 business days is, olay? 6 NS. NOLMERTON: Yea, please. 7 NS. NOLMERTON: Yea, please. 8 NS. BROOGH:	1		1	Page 256		
2 questions for you at this time, but as of right 3 now, it do not have my cher questions for you. 4 But I do want to thank you and your hashand 5 for your service to our country and for your time 6 today. 7 NS. MOLVERTON: Thanks so much. Well, we'll 8 just ank to take a too-minute break and we'll be 9 right back. So, can we go off the record for two minutes? 10 minutes? 11 (Thereupon, a short discussion was hold off 12 record.) 13 (Deposition resumed.) 14 THE COURT REPORTER: Chay, We're back on the 15 record. 16 NS. MOLVERTON: No questions. 17 NR. EBOCHI: No further questions from us 18 either, Ms. Nebbe greatly appreciate your time. 18 safe travels home. Thank you so much. And we do 12 reserve the right to read and sign the transcript, 12 please. 13 THE COURT REPORTER: Ckay, Thank you. And 14 Counsel, would you like to order the transcript today? 18 NS. MOLVERTON: Yes, please. 19 THE COURT REPORTER: Ckay, Mr. Brochu, would 30 you like to order the transcript as well? 4 NS. MOLVERTOR: Yes, please. 5 THE COURT REPORTER: All right. Standard 6 delivery, 10 business days is, chay? 5 NS. MOLVERTOR: Yes. 8 NR. BROCHI: Yes, please. 9 THE COURT REPORTER: All right. Standard 6 delivery, 10 business days is, chay? 11 NS. MOLVERTOR: Yes. 8 NR. BROCHI: Yes, please. 11 THI go off the record now. 12 (Deposition concluded at 64126 p.m.) 13 (Reading and signing of the deposition by the 14 witness has been reserved.) 15 (Reading and signing of the deposition by the 16 witness has been reserved.) 17 (Reading and signing of the deposition by the 18 witness has been reserved.) 18 AND THE TOWN OF TO						
But I do want to thank you and your hashend for your service to our country and for your time today. MS. MOJASTON: Thanks so much. Well, we'll just ask to take a two-minute break and we'll be right back. So, can we go off the record for two minutess? (Therespon, a short discussion was held off record.) Deposition resumed.) THE COMET RECORTE: Glay, We're back on the seither, Ms. MOJASTON: No questions. MS. WOJASTON: Thank you. MS. WOJASTON: Yes, please. MS. WOJASTON: Yes, please. MS. WOJASTON: Wes, please. MS. WOJASTON:			3	COUNTY OF BROWARD		
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SCORY, See MOLAMETON: Thanks so much. Well, we'll just ask to take a two-minute break and we'll be right back. So, can we go off the record for two minutes? (Thereupon, a short discussion was held off record.) (Thereupon, a short discussion was held off record.) (Thereupon, a short discussion was held off record.) (The COURT REPORTER: OKay. We're back on the record.) MR. BROCHI: No further questions from us either, No. Kebce greatly apprehiate your time. Safe travels home. Thank you. No. WOLDERTON: Thank you so much. And we do reserve the right to read and sign the transcript, please. THE COURT REPORTER: OKay. Thank you. And Counsel, would you like to order the transcript today? MS. WOLDERTON: Yes, please. THE COURT REPORTER: OKay. Mr. Brochu, would you like to order the transcript as well? MR. BROCHI: Yes, please. THE COURT REPORTER: OKay. Mr. Brochu, would delivery, 10 business days is, okay? MS. WOLDERTON: Yes, please. THE COURT REPORTER: OKay. Perfect. MR. BROCHI: Yes, please. THE COURT REPORTER: OKay. Perfect. MR. BROCHI: Yes, please. THE COURT REPORTER: OKay. Perfect. MR. BROCHI: Yes, please. THE COURT REPORTER: OKay. Perfect. MR. BROCHI: Yes, please. THE COURT REPORTER: OKay. Perfect. MR. BROCHI: Yes, please. THE COURT REPORTER: OKay. Perfect. MR. BROCHI: Yes, please. THE COURT REPORTER: OKay. Perfect. MR. BROCHI: Yes, please. THE COURT REPORTER: OKay. Perfect. MR. BROCHI: Yes, please. THE COURT REPORTER: OKay. Perfect. MR. BROCHI: Yes, please. THE COURT REPORTER: OKay. Perfect. MR. BROCHI: Yes, please. THE COURT REPORTER: Okay. Perfect. MR. BROCHI: Yes, please. THE COURT REPORTER: Okay. Perfect. MR. BROCHI: Yes, please. THE COURT REPORTER: Okay. Perfect. MR. BROCHI: Yes, please. THE COURT REPORTER: Okay. Perfect. MR. BROCHI: Yes as well of file. MR. BROCHI: Yes, please. THE COURT REPORTER: Okay. Perfect. MR. BROCHI: Yes, please. THE COURT REPORTER: Okay. Perfect. MR. BROCHI: Yes as well of file. MR. BROCHI: Yes as well of file. MR. BROCHI: Yes as well of fil	5	for your service to our country and for your time				
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